

Exhibit A

From: [Emily Hoff](#)
To: [Keith West](#)
Cc: [Jonah Santiago-Pagan](#); [Courtney Kitcherman](#); [David Thiruselvam](#); [Katherine Prettyman](#)
Subject: Re: Alvarado - Joint Pretrial Memo Draft
Date: Thursday, September 5, 2024 5:25:12 PM
Attachments: [image001.png](#)

Thank you for sending through; we are good with this version for filing.

Have a good evening,
Emily

Emily M. Hoff (she/her)
Assistant City Solicitor
City of Philadelphia Law Department
1515 Arch Street, 14th floor
Philadelphia, PA 19102
O: (215) 683-5362
emily.hoff@phila.gov
www.phila.gov/law

From: Keith West <keith@victimrecoverylaw.com>
Sent: Thursday, September 5, 2024 5:21 PM
To: Emily Hoff <Emily.Hoff@phila.gov>
Cc: Jonah Santiago-Pagan <Jonah.Santiago-Pagan@Phila.gov>; Courtney Kitcherman <courtney@victimrecoverylaw.com>; David Thiruselvam <david@victimrecoverylaw.com>; Katherine Prettyman <katherine@victimrecoverylaw.com>
Subject: Re: Alvarado - Joint Pretrial Memo Draft

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Please see attached.

Keith West
Attorney
VICTIMS' RECOVERY LAW CENTER
3650 Winding Way, Suite 200
Newtown Square, Pennsylvania 19073
215-546-1433 - Office Phone
215-546-1433 ext. 404 - Direct Line
856-208-8640 - Fax

keith@victimrecoverylaw.com

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On Thu, Sep 5, 2024 at 3:34 PM Emily Hoff <Emily.Hoff@phila.gov> wrote:

Keith,

Thank you for sending through.

I went through an accepted the changes made from our prior revisions so my additional amendments would be clear. I removed my comments relating to joint exhibits only for filing purposes.

The main objection we have is to the language used in the joint statement: “violently,” “murder of service dog,” and “holding her as prisoner.” However, we recognize that this follows the indication that this language is Plaintiff’s allegations. Rather than amending that language, we’ve removed the stipulation to the facts in the joint statement and leave only a stipulation to acting under of color of law. You’ll see the amendments via track changes. I also made a few other minor edits, which are shown via track changes.

If you agree with these edits, could you send through a final, clean version before filing?

Thank you,

Emily

Emily M. Hoff (she/her)

Assistant City Solicitor

City of Philadelphia Law Department

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From: Keith West <keith@victimrecoverylaw.com>
Sent: Thursday, September 5, 2024 2:56 PM
To: Emily Hoff <Emily.Hoff@phila.gov>
Cc: Jonah Santiago-Pagan <Jonah.Santiago-Pagan@Phila.gov>; Courtney Kitcherman <courtney@victimrecoverylaw.com>; David Thiruselvam <david@victimrecoverylaw.com>; Katherine Prettyman <katherine@victimrecoverylaw.com>
Subject: Re: Alvarado - Joint Pretrial Memo Draft

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Please find attached. I made a few minor edits. Good to file?

Keith West

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On Thu, Sep 5, 2024 at 1:59 PM Emily Hoff <Emily.Hoff@phila.gov> wrote:

Please see our edited version attached, with all mark-ups made via track changes.

Thank you,

Emily

Emily M. Hoff (she/her)

Assistant City Solicitor

City of Philadelphia Law Department

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From: Keith West <keith@victimrecoverylaw.com>

Sent: Thursday, September 5, 2024 1:17 PM

To: Emily Hoff <Emily.Hoff@phila.gov>; Jonah Santiago-Pagan <Jonah.Santiago-Pagan@Phila.gov>

Cc: Courtney Kitcherman <courtney@victimrecoverylaw.com>; David Thiruselvam <david@victimrecoverylaw.com>; Katherine Prettyman <katherine@victimrecoverylaw.com>

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Do you have an estimate of when you can send your part of this?

Keith West

Attorney

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On Wed, Sep 4, 2024 at 2:20 PM Keith West <keith@victimrecoverylaw.com> wrote:

Please find attached the draft Joint Pretrial Memo. If you make any proposed changes, be sure to redline.

Best wishes,

Keith West

Attorney

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